

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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MARIA TERAN AND JAVIER TERAN,

Plaintiffs,

v.

ZIMMER, INC.; ZIMMER HOLDINGS, INC.;  
and ZIMMER ORTHOPAEDIC SURGICAL  
PRODUCTS, INC.,

Defendants.

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Civil Action No. 1:11-cv-7709-LAK

**DECLARATION OF PHOEBE A. WILKINSON IN  
SUPPORT OF DEFENDANTS' MOTION TO DISMISS OR, IN  
THE ALTERNATIVE, TO TRANSFER VENUE**

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I, PHOEBE A. WILKINSON, state as follows:

1. I am an attorney with the law firm of Chadbourne & Parke LLP, counsel of record for the defendants, Zimmer, Inc., Zimmer Holdings, Inc., and Zimmer Orthopaedic Surgical Products, Inc. ("Defendants"), in the above entitled action. I have personal knowledge of the matters stated herein and could competently testify to them.

2. A true and correct copy of Plaintiff's Complaint For Damages And Demand For Jury Trial is attached as Exhibit A.

3. A true and correct copy of the Affidavit of Heather J. Kidwell is attached as Exhibit B.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 21, 2011.

/s/ Phoebe A. Wilkinson